

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA

v.

No. 4:22-MJ- 1041

GONZALO BRISENO RAMIREZ (01)
RODRIGO NAPOLES BRISENO (02)
CARLOS EDUARDO PLATA-YBARRA (03)

CRIMINAL COMPLAINT

I, the undersigned Complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief:

Beginning in or before November 2022, and continuing until December 21, 2022, in the Fort Worth Division of the Northern District of Texas, and elsewhere, defendants **Gonzalo Brisenó Ramirez (Gonzalo)**, **Rodrigo Napoles Brisenó (Rodrigo)**, and **Carlos Eduardo Plata-Ybarra (Carlos)** did knowingly and intentionally combine, conspire, confederate, and agree together, and with various other persons known and unknown, to transport and move illegal aliens, within the United States by means of transportation or otherwise, and to conceal, harbor and shield from detection such aliens in any place and any means of transportation, in furtherance of such violation of law for the purpose of commercial advantage or private financial gain.
All in violation of 8 U.S.C § 1324(a)(1)(A)(v) (8 U.S.C § 1324(a)(1)(A)(ii) and (iii)).

I, Weldon S. Thompson (your Affiant), further state that I am a detective with the Fort Worth Police Department (FWPD) and I am currently assigned as a Task Force Officer with the Federal Bureau of Investigation (FBI), Fort Worth, Texas. I have been employed as an officer with FWPD since 1991, assigned as a Detective since 2006. This investigation involves kidnapping in violation of 18 U.S.C. § 1201(a), and transporting and harboring of illegal aliens in violation of 8 U.S.C. § 1324(a).

The information contained in this affidavit is from my personal knowledge and from information provided by other individuals. The facts contained in this complaint are intended to show merely that there is sufficient probable cause for the requested complaint and do not set forth all of my knowledge about this matter. This complaint is based upon the following facts:

On December 16, 2022, the FBI was made aware of a ransom demand related to the transporting of illegal aliens into the United States. The FBI was advised the victim, F.P.L., and her two-year-old daughter, A.R., were being held captive somewhere in Fort Worth, Texas. The ransom demand was made by an individual utilizing the telephone number (682) 414-2612 and demanding \$23,000 to be paid to release both victims or they would be killed. Officers reviewed the messages and determined they were consistent with the kidnapping of undocumented individuals attempting to enter the United States illegally via human smuggling. The phone's carrier was identified as T-Mobile. T-Mobile was contacted and, due to the situation, provided phone records to the FBI. Records from an FBI database identified that the target phone was associated with a previous kidnapping case. The person associated with the Target phone was identified as **Rodrigo Briseno**. Investigation identified a **Gonzalo Briceno**, who owns a black Ford Expedition with Texas plate SGD4174, as a relative/associate of **Rodrigo**.

The Target phone was tracked heading north from Fort Worth on the morning of December 21, 2022. The FBI office in Kansas City, Missouri, was notified of this information and agents were able to locate the black Ford Expedition.

The vehicle was stopped and the driver was identified as **Rodrigo**. **Rodrigo** was interviewed by agents and he stated that victims F.P.L. and her daughter A.R. were at his brother's (**Gonzalo**) house on Miller Avenue, Fort Worth, Texas. **Rodrigo** told agents that he and others were involved in an organization that transported undocumented individuals from Mexico across the United States-Mexico border and then ultimately to a destination in the United States. The average cost for an adult is \$10,000 dollars and \$12,000-\$14,000 for a child. They are required to pay at least a portion of the money to the organization prior to leaving Mexico. By the time the aliens reach the house on Miller Avenue in Fort Worth, the remainder of the money must be paid before the aliens are allowed to leave. While at the house, the alien can only leave when accompanied by **Rodrigo**, his friend, or his cousin.

After receiving this information, officers and agents began surveillance at the residence on Miller Avenue. A white GMC Yukon, which is registered to **Rodrigo**, was located in the driveway of this location. On December 21, 2022, a state search warrant for the location was obtained. Later that day, FBI SWAT, along with the help of marked FWPD units, served the warrant. During the search of the residence, 22 individuals were located and detained pending investigation. Based on the investigation, two of the individuals were determined to be involved in the harboring and transporting offenses, those being **Carlos Eduardo Plata Ibarra**, who was observed leaving the location, was stopped a short distance away and was detained, and **Gonzalo Briseno Ramirez**, who was found at the location.

The other 20 individuals were interviewed and admitted to being in the United States illegally. Generally, these individuals stated they had paid a “coyote” to move them across the border from Mexico to an unknown location. The individuals were eventually transported to Fort Worth. Some of the individuals stated they had arrived that day.

Carlos and **Gonzalo** were transported to a Fort Worth Police Sub-Station where they were interviewed. **Carlos**, after being advised of his rights, agreed to speak with the Affiant. During the course of the interview, **Carlos** stated he was actively involved in an organization that was transporting individuals across the border from Mexico into Texas, then from there eventually to his residence on Miller Avenue in Fort Worth. Each of the aliens hired a person, known as “coyote,” to smuggle the individuals across the Mexico-United States border. Once they cross the border, the aliens are taken to an unknown location, after which **Carlos** is contacted by a person he knows as “Panther,” who states that a shipment is being delivered in a trailer to an address, usually around the Dallas area. **Carlos, Rodrigo, Gonzalo**, and/or another person would meet the trailer and take custody of the illegal aliens. This scenario is done one or two times a week, and there are approximately 60 to 80 aliens per month that are taken to the Miller Avenue residence. **Carlos** advised the individuals pay him the remaining balance of what they owe to the “coyote” for being smuggled into the country. **Carlos** said that once the balance is paid, he arranges to transport them to a location requested by the alien, usually a relative’s house. If the alien or his/her family does not pay the full amount, the individual is held there until the amount owed is paid.

The individual is not free to leave until the bill is paid.

Gonzalo, after being advised of his rights, stated he wished to speak with the Affiant. During the course of his interview, **Gonzalo** said he was actively transporting individuals who had entered the country illegally. **Gonzalo** stated that once the individuals had paid their balance owed, **Gonzalo** and his conspirators would arrange to have the alien transported to a family member's residence. **Gonzalo** advised the individuals were not free to leave and were kept in the locked residence. **Gonzalo** stated that M.A.R. was one of the persons who owed money and was not free to leave. M.A.R. had been abandoned by her original "coyote" and had been "re-sold to another coyote." When M.A.R.'s family was contacted, the family was not willing to pay more so she was staying at the house longer than normal.

M.A.R. was one of the individuals located at the Miller Avenue residence. She was interviewed by agents and stated that she is from Honduras and approximately four months ago, she went to Mexico City based on the promise from a friend that she could get to the United States. Approximately three months later she made it to El Paso, through Juarez, with the help of an unknown person. In El Paso, she was put into an 18-wheeler tractor trailer and transported to Fort Worth, arriving at the residence on Miller Avenue, on about November 24, 2022. She was told that her family would need to pay \$10,000 for her travel and stay, and each day they did not pay, the price would increase by \$100. On one occasion, **Gonzalo** and **Rodrigo** took her to eat and told her that if she tried to run that they knew her name and bad people would come after her.

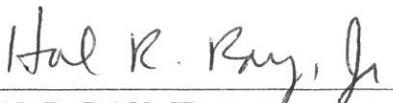
M.A.R. identified **Gonzalo** and **Rodrigo** as being involved in the harboring and transporting, however **Rodrigo** was not at the house at the time of the search warrant.

F.P.L. and her daughter A.R. were also found at the residence. F.P.L. was interviewed and she stated that she is from Honduras and was trying to get to Baltimore, Maryland, where her husband is located. She stated she had been at the location for approximately 15 days and was told that her family was not paying the remainder of the amount she owed, so she was not allowed to leave. She was locked in the house with her two-year-old daughter and different women over the course of the 15 days. She was allowed to move about inside of the house and was fed, however she was not allowed to leave the house without being escorted.

As such, based upon the aforementioned facts, I believe that **Gonzalo Briseno Ramirez, Carlos Eduardo Plata-Ybarra, and Rodrigo Napoles Briseno** conspired to transport and harbor illegal aliens in violation of 8 U.S.C. § 1324(a)(1)(A)(v).


Task Force Officer Weldon Thompson
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, this 27TH day of December, 2022, at 1:43 a.m. (p.m.) in Fort Worth, Texas.


HAL R. RAY, JR.
UNITED STATES MAGISTRATE JUDGE